

UNITED STATES BANKRUPTCY COURT
FOR THE
DISTRICT OF MASSACHUSETTS
(Eastern Division)

In Re:)	
)	
)	
EDGARD VASQUES DEMIRANDA NETO,)	Case No. 16-10026-MSH
)	Chapter 7
Debtor)	
)	
SHAMROCK FINANCE, LLC,)	
)	
Plaintiff)	Adversary Proceeding
)	
Vs.)	No. 01077
)	
EDGARD VASQUES DEMIRANDA NETO,)	
)	
Defendants)	
)	

**CERTIFICATION OF CONFERENCE AND WRITTEN
REPORT OUTLINING PROPOSED DISCOVERY PLAN**

Pursuant to Fed. R. Civ. P. 26(f), as made applicable herein by Fed. R. Bankr. P. 7026, plaintiff Shamrock Finance, LLC and defendant, Edgard Vasques deMiranda Neto hereby file this certification and written report outlining a proposed discovery plan. This discovery plan constitutes a change from that set forth in the Court's Pretrial Order dated June 14, 2016.

A. Certification

The undersigned hereby certify that on July 8, 2016 they conferred by telephone, pursuant to Fed. R. Civ. P. 26(f) as made applicable by Fed. R. Bankr. P. 7026, to consider the nature and basis of their claims and defenses and the possibilities for a prompt settlement or resolution of the adversary proceeding, and to develop a proposed discovery plan.

B. Proposed Discovery Plan

The parties propose the following discovery plan:

1. Automatic required disclosures will be made on or before July 22, 2016.
2. All discovery will be completed on or before September 30, 2016.
3. The parties will file a Joint Pretrial Memorandum on or before October 28, 2016.

The parties currently do not believe any changes are necessary to the manner of and limitations on discovery provided by the rules of this Court.

C. Automatic Disclosures

The parties state that they will have complied with the automatic disclosure provisions of Rule 26(a)(1) and (2) as of July 22, 2016.

D. Estimated Length of Trial

The parties estimate that trial will take one day.

Respectfully submitted,

SHAMROCK FINANCE, LLC,
By its attorneys,

/s/ James J. McNulty

James J. McNulty, Esq.
BBO # 339940
40 Court Street
Suite 1150
Boston, MA 02108
(617) 263-3300

Dated: July 12, 2016

EDGARD VASQUES DEMIRANDA NETO
By his attorney,

/s/ George J. Nader

George J. Nader
BBO #549149
Riley & Dever, P.C.
210 Broadway, Suite 101
Lynnfield, MA 01940
(781) 581-9880
nader@rileydever.com

Dated: July 12, 2016

CERTIFICATE OF SERVICE

I, George J. Nader, hereby certify my understanding that on July 12, 2016, notice of the filing of **Certification of Conference and Written Report Outlining Proposed Discovery Plan** was sent by the Court, by e-mail, to:

jjm@jjmcnultylaw.com

/s/ George J. Nader
George J. Nader